LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165 T: 212.792.0046 • E: Joshua@levinepstein.com

August 1, 2023

VIA ECF

The Honorable Magistrate Judge Katharine H. Parker U.S. District Court, Southern District of New York 500 Pearl Street New York, NY 10007

> Kuan v. Notoriety Group LLC et al Re:

Case No.: 1:22-cv-01583-MKV

USDC SDNY DOCUMENT **ELECTRONICALLY FILED** DOC #: DATE FILED: 8/3/2023

Dear Honorable Judge Parker:

This law firm represents plaintiff Megan Kuan (the "Plaintiff") in the above-referenced matter.

Pursuant to Your Honor's Individual Practice Rule I(A), and the directives in Your Honor's July 21, 2023 Order [Dckt. No. 74], this letter respectfully serves to provide the Court with a status update in the above-referenced action and requests the adjournment of the conference scheduled for August 22, 2023.

On July 31, 2023, the undersigned had a conference call with counsel to the Defendants Notoriety Group LLC (the "Corporate Defendant"), Anthony Shnayderman, Nathan Leong, and Niv Shaked (collectively, the "Individual Defendants", and together with the Corporate Defendant, the "Defendants"). During the conference call, the counsel to the Defendants stated that he believes that the settlement conference scheduled for August 22, 2023 at 10:30 a.m. would not be productive in settling this case. Given that the undersigned has a one-week vacation scheduled beginning on August 22, 2023 and the Defendants' settlement position, the Plaintiff respectfully requests the adjournment of the conference scheduled for August 22, 2023.

This letter also requests that the <u>Plaintiffs' responsive deadline to the Defendants' Motion</u> to Vacate the Judgment filed on July 19, 2023 [Dckt. Nos. 65,66,and67] be set for August 21, 2023.

Thank you, in advance, for your time and attention to this matter.

SO ORDERED:

Respectfully submitted,

HON, KATHARINE H. PARKER

UNITED STATES MAGISTRATE JUDGE 8/3/2023

The conference scheduled for August 22, 2023 is converted to a telephonic conference on October 12, 2023 at 12:15 p.m. Counsel for the parties are directed to call Judge Parker's Chambers court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267.

Plaintiff's deadline to respond to Defendants' Motion to Vacate the Judgment is August 21, 2023.

The Clerk of the Court is respectfully requested to close the motion at ECF No. 75.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: <u>/s/ Joshua Levin-Epstei</u> Joshua Levin-Epstein, Esq. 60 East 42nd Street, Suite 4700 New York, New York 10165 Tel. No.: (212) 792-0046

Email: Joshua@levinepstein.com

Attorneys for Plaintiff

VIA ECF: All Counsel